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**FFCA MONTHLY PROGRESS REPORT FOR
PERIOD ENDING JUNE 30, 1988**

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**11
ENCLOSURE**

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SUMMARY

Progressive actions associated with the Federal Facilities Compliance Agreement (FFCA) continued during the month of June, 1988. Highlights of work completed this month, and a separate listing of ongoing actions are shown below.

In April, FMPC completed installing the 76 on-site monitoring wells, and developed all of the 200 and 300 series wells during the month of May. Drilling continued this month on the 19 off-site wells. Nine of these wells have been completed to date, and one is under construction.

For FY 1988, five (5) stacks have been tested; three (3) in February and two (2) in April. During the month, four final stack test reports (the three February tests and one April test) were delivered to FMPC. Three are currently under review, and one was transmitted to SWOAPCA on June 10, 1988.

The tenth monthly RI/FS technical progress report was transmitted to the USEPA on June 20, 1988.

INTRODUCTION

As an integral part of the agreement between the U. S. Department of Energy (US DOE) and the USEPA signed on July 18, 1986, monthly reports are provided by US DOE to USEPA regarding the progress made to meet the provisions of that agreement. This report fulfills that requirement by describing actions undertaken at the Feed Materials Production Center (FMPC) during the period June 1 through June 30, 1988.

WORK ASSIGNMENTS AND PROGRESS

The status of ongoing and completed work in support of the FFCA is summarized in Table 1. Additional descriptions of the work being performed and progress on these tasks are presented in the following sections. In both this portion of the monthly report, and in Table 1 (attached) descriptions of actions are presented in a format consistent with that of the FFCA.

Comprehensive Environmental Response Compensation and Liability Act (CERCLA).

1. Interim Remedial Measures

Sections I.A & I.B

FMPC Standard Operating Procedures are being revised sitewide to address EPA comments received on the CERCLA section of the FFCA.

Section I.C

FMPC is continuing the design of the K-65 silos internal stabilization using sand for radon attenuation rather than the internal foam application previously considered. This change in design was discussed with US EPA and Ohio EPA at the June 28 TIE Meeting. The Final Design will be completed in mid-July, the contract will be awarded by mid-September, and stabilization will begin in early October.

FMPC conducted a probe test of the K-65 silos to determine the penetrability and consistency of the materials inside. A probe was inserted in the vents of the silos to a depth of 5 feet in silo #1 and 10 feet in silo #2 with moderate resistance, indicating that the sampling scheduled for October will be possible.

ASI/IT has prepared a radiological analysis for the proposed interim storage thorium warehouse. The study is to determine if FMPC will exceed its Final Safety Analysis Report (FSAR) gamma level limit, established by USEPA, if all the drummed thorium were to be stored in one warehouse. The report is in draft and under FMPC review.

On May 18, 1988, DOE received USEPA approval for finishing the system installation for removal of thorium from the Plant 8 silos and bins. Sampling of the material in the silo and bin was completed in June, and the redesign of the removal equipment has begun. The thorium removal and repackaging is scheduled for completion in January, 1989.

2. Remedial Investigation/Feasibility Study (RI/FS) Section 2.A to 2.D

Work on these sections is complete.

Section 2.E

The Work Plan Revision 3 and supporting documents were transmitted to USEPA on March 31, 1988. The Work Plan Revision 3 incorporates necessary revisions resultant from EPA's comments received to date on the RI/FS Work Plan. On May 16, FMPC received USEPA approval on Revision 3 of the RI/FS Work Plan.

Section 2.F

ASI continued the off-site drilling program, completing to date nine of the 19 new monitoring wells to be constructed. All of these wells have also been developed.

FMPC has obtained approval for the installation of all of the 19 off-site monitoring wells. The licensing agreement for the northeast well cluster is at DOE Headquarters for final approval. The estimated completion date for the well drilling is August, 1988.

The surface walkover radiation survey program was completed during the reporting period, with a total of 775 grids being surveyed. Of the 959 projected soil samples, 590 samples have been taken, making this program approximately 62% complete. FMPC returned the Ultra Sonic Ranging and Data (USRAD) system to ORNL.

The Facilities Testing Plan, required under the RI/FS, has been prepared by ASI. Following FMPC review, the Plan will be forwarded to USEPA-Region 5 in July.

Section 2.G to 2.L

Work has not yet begun on these items.

3. Reports and Record Keeping

Section 3.B

The tenth RI/FS monthly technical progress report was transmitted to USEPA on June 20, 1988.

Clean Air Act (CAA)

Section B - Items 1 through 4

The FMPC deliverable addressing Section B - Items 1 through 4 of the Clean Air Act Section of the FFCA was transmitted to USEPA in August 1986.

Section C

Under the FFCA, DOE will comply with the reporting provisions contained in 40 CFR 61.94 (c). Under these provisions, the DOE is required to, by June 1 annually, submit a report which includes the results of monitoring emissions from points subject to 40 CFR 61 Sub-part H and their associated dose calculations. The annual report for calendar year 1986 emissions was provided to EPA in 1987. The Annual Radionuclide Air Emission Report for calendar year 1987 was transmitted to USEPA on June 14, 1988.

Section D.I & D.2

The proposed yearly particulate stack testing schedule for FY-88 was transmitted to EPA on December 31, 1987. Due to several changes in the stack testing schedule, a revised schedule will be submitted in July. The results of the FY-87 stack tests are complete. The ten (10) particulate stack test reports for 1987, including radiological results, were transmitted to USEPA on March 18, 1988.

Stack tests have been completed on five FMPC emission points during FY 1988. Samples collected have been analyzed by Weston Analytics. The Final reports for four of these tests (the three February tests and one April test) will be transmitted in July. The report for the test of the Boiler #1 stack was forwarded to SWOAPCA on June 10, 1988.

Section E.2

The sixth Quarterly Particulate Emission Report covering the period from January 4, 1988, through April 11, 1988, was reviewed by FMPC and forwarded to USEPA on June 20, 1988.

Sections F and G

Work on these sections is complete.

Resource Conservation and Recovery Act (RCRA)

Sections A and B - Items A.I through A.7 and Items B.I through B.5

USEPA-Region V provided comments on Sections A and B in December 1986. Both Sections were revised to reflect USEPA comments. The revised Section A was transmitted to the USEPA on January 23, 1987. The revised Section B was transmitted to the USEPA on January 28, 1987.

A May 12, 1987 letter from William D. Franz to James A. Reafsnyder provided a second round of USEPA comments on these revised FFCA deliverables. WMCO submitted a Waste Characterization Report to DOE on March 29, 1988, which was subsequently forwarded to EPA on March 29, 1988, in response to RCRA Item A.I. The Waste Characterization Report answers the majority of EPA's RCRA concerns as spelled out in the Franz letter. FMPC's response to the remaining comments on RCRA A1-A7 is under review and will be delivered to US EPA and Ohio EPA in July.

TABLE 1.

STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
30-June-88

COMPLETION
TIME AFTER
FFCA
SIGNED

STATUS

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS

CERCLA ACTIONS			
1	INTERIM REMEDIAL MEASURES		
1.A.	Develop and implement O&M procedures and work practices to control radioactive emissions, including radon gas and decay products.	60 days	Completed. Comments were received from U.S. EPA on June 2, 1987. A comment response was transmitted to U.S. EPA on July 10, 1987. SOPs in process of being revised.
1.B.	Develop and provide to EPA a plan and implementation schedule for the interim control of radon at the K-65 silos.	30 days	Revised deliverable was transmitted to EPA on January 23, 1987. Second set of comments on original August 17, 1986 submittal received June 17, 1987. A comment response was transmitted to U.S. EPA on July 10, 1987.
	Develop & provide to EPA a plan & implementation schedule for control of thorium compounds.		This schedule was provided to US EPA in the revised deliverable transmitted on January 23, 1987. Updates of thorium repackaging activities were presented to the US EPA during the June TIE meeting.
1.C.	Implement radon control plan approved by the EPA.	----	External Foaming of K-65 interim remedial action was completed Dec. 6, 1987. Internal Material applications are being re-evaluated for radon attenuation. Sampling is schedule for late September. Stabilization will begin in October, 1988.
	Implement interim control plan for thorium compounds as approved by the US EPA.		The Technical Summary of Plant 8 (silos & bins) thorium repackaging was transmitted to USEPA on 17-Feb-88. USEPA comments on the summary were issued on 25-Mar-88. The Thorium Technical Information Package (TIP) has been reviewed by US EPA, and approval obtained on May 18, 1988 for the subcontractor to begin construction of the removal equipment and containment facilities. A thorium silo sampling program was completed in June.
2	REMEDIAL INVESTIGATION/INVESTIGATION STUDY		
2.A.	RI/FS work to be conducted in accordance with EPA guidelines.	NA	No Action Required.
2.B.	-- No Action Required --	----	

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2.C.	Provide to EPA analysis results for laboratory certification ---- SOW Task 7b.	45 days	Completed.
2.D.	Submit to EPA Work Plan for a complete sitewide RI/FS.	90 days	Work plan transmitted December 19, 1986. Supporting documents were transmitted on January 30, 1987.
2.E	Amend and submit revised RI/FS work plan to EPA if deficiencies are found.		Draft comments received from U.S. EPA on May 14, 1987. Final comments issued from U.S. EPA June 24, 1987. Comment responses and a revised Work Plan were transmitted to EPA on August 24, 1987.
			USEPA comments on the Work Plan Rev. 1 were received on December 28, 1987. The Work Plan Rev. 2 was transmitted to USEPA on February 11, 1988. Revision 3 of the Work Plan and supporting documentation was transmitted to USEPA on March 31, 1988. Revision 3 of the Work Plan was approved by US EPA on May 16, 1988.
2.F	Implement tasks detailed in the approved RI/FS Work Plan.		A conditional approval to initiate drilling 45 RI/FS monitoring wells was received from USEPA. Drilling of the wells was initiated on August 25, 1987. The FMPC received approval for installation of remainder of the monitoring wells on February 18, 1988. A total of 76 groundwater monitoring wells were completed by April 30, 1988, completing the drilling of all on-site wells. Installation of 19 off-site wells is continuing.
3	REPORTS AND RECORD KEEPING		
3.B	RI/FS Progress Report		The tenth monthly RI/FS progress report was transmitted to US EPA on June 20, 1988.

CLEAN AIR ACT

A.	-- No Action Required --	----	
B.1.	Install real-time alarm monitors on all MAJOR emission points. Also list non-alarmed emission points.	30 days	Completed.

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SIGNED

STATUS

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
B.2.	Establish and implement administrative controls for real-time monitors to ensure any unplanned releases will be detected and dealt with in 24 hours.	30 days	Completed.
B.3.	Establish and implement sample collection and analysis procedures and a QA plan to monitor ALL radionuclide emission points.	30 days	Completed.
B.4.	Establish schedule for the installation and replacement of emission control devices.	30 days	The schedule is included with the Annual Progress Report, sent to USEPA on April 4, 1988. A total of 57 dust collectors will be replaced.
	Prepare annual progress report on installation and replacement of emission control devices.	annually	The first Annual Progress Report on the Replacement of Air Pollution Control Devices-FFCA, Clean Air Act Section was submitted to USEPA on April 4, 1988.
	Respond to U.S. EPA comments on Air Monitoring Network WDF-JAR dated 12-May-87.		Completed. WDF concerns on monitoring station no. 6 addressed in July 14-17, 1987 meeting at the FMPC. Modifications to address WDF concerns on FMPC monitoring stations meeting EPA siting criteria were completed by April 30, 1988.
C.	Provide annual reports to EPA per 40 CFR 61.94(c)	yearly	The annual report for CY-1986 was transmitted to EPA in 1987. The Annual Radionuclide Air Emission Report for calendar year 1987 was forwarded to US EPA on June 14, 1988.
D.1	Provide EPA yearly stack-testing schedule.	yearly	Completed. The first annual stack testing schedule was transmitted to EPA in December, 1986. A revised schedule was transmitted July 24, 1987. The stack test schedule for 1988 was transmitted to EPA on December 31, 1987. A revised schedule will be transmitted in July, 1988.
D.2	Provide EPA stack-test results for stacks tested that year.	45 days after test analyses completed	Final stack tests were completed in September, 1987. Stack test results for 10 stacks (including particulate radiological results) were submitted to EPA on March 18, 1988. Stack tests have been completed on five FMPC emission points during FY 1988. The Boiler #1 report was sent to SWOAPCA on June 10. The other four reports will be submitted

TABLE 1.

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30-June-88

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
			in July, 1988.
E.1	Maintain records of monthly particulate matter emissions.	----	Continuing.
E.2	Provide quarterly reports to EPA on these emissions.	quarterly	The initial report was transmitted on December 12, 1986. The second report was issued April 20, 1987. The third report was issued July 29, 1987. The fourth report was issued October 19, 1987. The fifth quarterly report was transmitted to EPA during the month of March. The sixth Quarterly Particulate Emission Report covering the period of Jan. 4-Apr. 11, 1988 period was sent to US EPA on June 20, 1988.
F.	Provide EPA list of environmental air monitoring equipment, including location and the O&M program.	60 days	Completed.
G.	Develop and provide EPA an O&M program for air pollution control devices.	90 days	Completed.
RCRA			
A.	Achieve compliance with interim status regulations.	30 days	Revisions to the A1-A7 submittals transmitted on January 23, 1987. Additional comments received on May 12, 1987. FNPC's final response to US EPA is anticipated by July, 1988.
			A Hazardous Waste Analysis Plan was transmitted to USEPA on March 29, 1988.
A.1.	Conduct hazardous waste determination on all waste streams.	30 days	Completed.
A.2.	Commence a hazardous waste analysis program.	30 days	Completed.
A.3.	Update of operating records pursuant to 40 CFR 265.73 and 265.309.	30 days	Completed.
A.4.	Include full name and signature and date received on manifests pursuant	30 days	Completed.

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STATUS OF ACTIONS AS OF 30-June-88			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
	to 40 CFR 265.71.		
A.5.	Update the facility closure plan to reflect the year the facility expects to begin closure.	30 days	Completed.
A.6.	Begin collection of all run-off from the active portions of pit 4.	30 days	Completed.
A.7.	Prepare and maintain outline for a groundwater quality assessment program.	30 days	Completed.
B.	Submit to EPA for approval a detailed groundwater monitoring plan.	90 days	Complete. Additional comments received from US EPA on May 12, 1987.
B.1.	Determine groundwater flow at the RCRA regulated units.	90 days	Completed.
B.2.	Provide map showing location of all RCRA monitoring wells.	90 days	Completed.
B.3.	Include design and construction specs for all RCRA wells.	90 days	Completed.
B.4.	Monitor for all Appendix VIII constituents, including radionuclides.	90 days	Completed.
B.5.	Include a sampling and analysis plan to meet 40 CFR 265.92.	90 days	Completed.
C.1.	Develop a closure plan for the landfill pursuant to 40 CFR 265.112.	60 days	Completed. Final closure plan was transmitted to US EPA on July 29, 1987. OEPA granted approval of the closure plan on February 9, 1988. On May 3, 1988, FMPC provided OEPA construction specifications and drawings for capping over Pit 4. OEPA sent additional comments to revise the closure plan, which was received 6-29-88. FMPC will submit a revised application in July, 1988.
C.2.	Develop a post-closure plan for the landfill pursuant to 40 CFR 265.118.	60 days	To be developed following RI/FS.

RADIATION DISCHARGE INFORMATION

TABLE 1.

STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF 30-June-88			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
A.	Respond to USEPA comments on Items A.1. - A.3. WDF-JAR dated 12-May-87.		Completed.
A.1	Provide EPA with existing offsite environmental monitoring program.	30 days	Completed.
A.2	Provide EPA the QA program associated with the environmental monitoring program.	30 days	Completed.
A.3	Report to U.S. EPA, OEPA and Ohio Department of Health the results of the continuous liquid discharge samples.	quarterly	Initial report transmitted on December 12, 1986. Second report transmitted April 20, 1987. Third report transmitted July 29, 1987. Fourth report was transmitted in November, 1987. The fifth quarterly report was transmitted to USEPA on March 18, 1988. The sixth quarterly report was sent to EPA on June 20, 1988.
REPORTING REQUIREMENTS			
B	Issue monthly progress report of actions taken to ensure compliance with FFCA requirements.	30 days	Aug. 86 issued to US EPA Sep. 86. Sep. 86 issued to US EPA Oct. 86. Oct. 86 issued to US EPA Nov. 86. Nov. 86 issued to US EPA Dec. 86. Dec. 86 issued to US EPA Jan. 87. Jan. 87 issued to US EPA Feb. 87. Feb. 87 issued to US EPA Mar. 87. Mar. 87 issued to US EPA Apr. 87. Apr. 87 issued to US EPA May 87. May 87 issued to US EPA Jun. 87. Jun. 87 issued to US EPA Jul. 87. Jul. 87 issued to US EPA Aug. 87. Aug. 87 issued to US EPA Sep. 87. Sep. 87 issued to US EPA Oct. 87. Oct. 87 issued to US EPA Nov. 87. Nov. 87 issued to US EPA Dec. 87. Dec. 87 issued to US EPA Jan. 88. Jan. 88 issued to US EPA Feb. 88. Feb. 88 issued to US EPA Mar. 88. Mar. 88 issued to US EPA Apr. 88. Apr. 88 issued to US EPA May. 88. May 88 issued to US EPA June 88.